

AFFIDAVIT OF [REDACTED]

I, [REDACTED] being duly sworn, declare under the pains and penalties of perjury, that the following is true and correct to the best of my knowledge and belief. The information provided below about my professional and later personal relationship with Dr. Ablow is not intended to be inclusive of every interaction I had with Dr. Ablow, but rather a broad overview.

1. In early 2015, I was 25 years-old and living in Ohio with my parents when my mother (on my behalf) reached out to Keith Ablow, MD regarding the use of Ketamine infusions to treat what had been diagnosed as longstanding depression.
2. In January 2015, my mom and I traveled to Newburyport, Massachusetts for my Ketamine infusions and evaluation.
3. During my first visit to Newburyport, Dr. Ablow began sending me text messages and emails regarding treatment, medication and scheduling appointments. He also sent me a text message saying he would have taken me sledding if I had not been feeling ill with a smiley face. Before I left, Dr. Ablow gave me several books, including Franny and Zooey and Pobby and Dingan and the War of Art. He encouraged me to send him text messages multiple times daily to let him know how I was feeling.
4. After returning to Ohio, Dr. Ablow encouraged me to stay in constant contact with him. He repeatedly told me to email him or text him daily all of my thoughts. If I did not respond to his text messages or emails quickly or frequently enough, he would ask me to report to him on how I was doing. I had never had a therapist or any professional take such an interest in me before. I would often apologize to Dr. Ablow for sending what I considered to be my trivial thoughts. One time he told me that “[n]othing you could write to me would be trivial... [p]lease ... tell me how you are feeling.” At some point, it became normalized and frankly necessary for me to communicate with Dr. Ablow several times a day. In retrospect this placed Dr. Ablow constantly in my mind. I have saved the majority of my text and email communications with Dr. Ablow.
5. As my daily communications with Dr. Ablow continued I became dependent on them and on him. I would express self-doubt and concerns that I did not think I was a deserving person. I became anxious about trusting my thoughts and decisions unless they were validated by Dr. Ablow. As time went on I would become anxious and even panicked if he did not weigh in or respond. He convinced me that he was the only person who could make me well. He told me that he would rescue me because he could see the “real” me. He would tell me that he saw me with a clearer lens than I saw myself, that he saw “me” and knew “me” and that I deserved to see how extraordinary I was. Now I find it frightening if anyone says I am special.
6. I continued my treatment with Dr. Ablow while I lived in Ohio with sessions over Skype. When we would talk over Skype, Dr. Ablow would complement my looks and tell me how pretty I was and that he missed me. He brought up the topic of my sexual preferences and whether I liked to be submissive or dominant when in a relationship. This made me uncomfortable and I wouldn’t know what to say. Dr. Ablow would

lead these conversations in a way that it did not take long to know how he wanted me to answer. It was clear that Dr. Ablow wanted me to be submissive since he was dominant if there were to be a sexual relationship between us. I also became stressed and felt guilty at this time that these sessions were very costly for my family and they were riddled with personal communications rather than therapy. He would get brisk and upset if I communicated frustration about how little therapy was occurring. As these sessions progressed I felt like I needed to constantly compliment him since he made it clear that he needed to be praised and I would be rewarded with praise in return.

7. Early in my treatment, Dr. Ablow would go out of his way to be accommodating with my appointments, offering early morning, evening and weekend sessions. On one occasion very early in my treatment with Dr. Ablow, I wasn't feeling well and had to cancel my appointment. Although I knew he would usually charge patients for last minute cancellations, he did not charge me and instead gave me two additional appointments, one being at 8 am on a Sunday. When I thanked him, he responded "it is only what you deserve.... And what you inspire." When Dr. Ablow was late for one of our appointments, he apologized and told me he would "always try to deliver on promises." This behavior made me feel special and like Dr. Ablow was more than just my therapist.
8. My second visit to Newburyport in March 2015, I took without my mother at Dr. Ablow's encouragement. He directed me to stay in a B&B near his office. During this trip, Dr. Ablow took me out to dinner at Nix in Newburyport (I understand this restaurant has since closed). It felt more like a date than it did a therapy session. I asked Dr. Ablow why he had such a terrifyingly strong effect on me and he told me it was nothing to be afraid of. He told me during this visit that we had a special connection and that he wanted to have a romantic relationship with me. It was at this time that my sexual encounters with Dr. Ablow began.
9. The first time I remember Dr. Ablow being physically sexual with me was at his office during this trip. He told me how excited he was to have me back in Newburyport and how he missed me. While we were talking, he took my hand, kissed it and then gently bit the pad of my hand and began sucking on my fingers. I was flabbergasted at what Dr. Ablow was doing and told him I was confused. Dr. Ablow asked if I hadn't noticed that he was attracted to me. He tried to kiss me and made sexual comments about us being together.
10. By April 2015, Dr. Ablow was offering to help me find a job and sometime later started sending me apartment listings in the Newburyport area. While Dr. Ablow would make it seem like moving was entirely my decision, he would suggest that he was the best person to "treat" me and my longstanding depression and that I deserved only the best. He would entice me by offering me discounted rates for Ketamine infusions and told me that living outside the confines of my family was a good thing for me. He put me in contact with his friends and business partners to set up job interviews. He told me that he could convince anyone of anything.

11. As early as March 2015, Dr. Ablow suggested over text message that we double down on the clinical boundaries to make sure that we were all about my needs and recovery. Now I understand that these messages were just cover in the event that I ever disclosed what was really happening. I was feeling emotional whiplash from the disparity between how he talked and behaved in person and on the phone and the way he communicated by email and text message. He would tell me in person that we would find a way to have our relationship out in the open. Dr. Ablow's sexual advances towards me continued. Again in April 2015, Dr. Ablow sent me another text message discussing the rules of transference and countertransference and said we needed to limit our topics of conversation. Again, in hindsight I see this message as cover since it was 180 degrees from his conduct with me. I told him I believed I could give consent to a sexual relationship while he was my therapist. I now understand that this was a product of the very transference that I was denying existed. By this point, Dr. Ablow and I were intimately involved and our sexual discussions did not stop after his suggestion.
12. On the third trip I came out for an extended stay of about 6 weeks in April and May and I stayed in an Airbnb in Salisbury. Dr. Ablow had stressed that it was unhealthy for me to be at home and that I would be much happier near him. When I expressed concern that I did not know anyone he told me we could see each other often when I was leaving nearby. Dr. Ablow had repeatedly asked me for photographs of my room at home, which I told him I did not want to give him because I didn't think it was a good representation of myself. Dr. Ablow suggested that "Maybe you could never be you, in that house. Maybe your room is a symbol of that. Maybe it is a stark, unadulterated truth. Maybe it is telling you to get out of there." I now realize this was Dr. Ablow's way of encouraging me to move to Newburyport to be near him. We were very involved sexually by this time. We met at his office often, but not always, before or after his office staff had gone home, or on the weekends. He was getting worse and worse about doing any kind of therapy at appointments, he just talked about himself, his purchases, his work, how much he loved me, how we would find a way to be together, or he would touch my breasts and/or vagina or kiss me or ask me to scratch or massage his back, or have me to touch his penis or my vagina. Sometimes the constant guilt and worry about the cost of appointments to my parents would boil over and he'd say he'd help me or would charge me very little, but he didn't follow through in any meaningful way. He would also say that we should meet for free at his office later and he'd make the lost time up to me, but when we'd meet and it would again be sexual, even if I expressed that he hardly knew anything about what I was thinking or feeling. At this point I really thought I loved him and he loved me, so I tried not to question him.
13. From April of 2015 my sexual relationship with Dr. Ablow escalated. If there was staff in the building he would have me pull my jeans and panties down and he would put his hands under my shirt and unfasten my bra and fondle my breasts. He would take out his penis and touch himself and coax me to touch my vagina and talk about how much I wanted him. If staff were not present, typically, Dr. Ablow would have me completely disrobe if we were alone in the office in the evenings so that he could look at my body while he would keep his clothes on and only unzipper his pants and

take his penis out. Sometimes Dr. Ablow would touch my breasts and vagina, other times he would want me to touch myself. He would have me touch his penis and would also have me perform oral sex. He would also insert his fingers into my vagina and would perform oral sex on me as well. He was very careful not to climax. Much later, when I confronted him about this he informed me that he had a lot to lose and did not want to leave evidence. Of course, all of this time I was his patient and he was billing me for “treatment”. This did not happen every visit although it happened frequently.

14. I came out several more times staying in Newburyport, once in a hotel in Amesbury and then on Plum Island before moving out permanently in November of 2015 [REDACTED] [REDACTED] in Newburyport. When I was staying in Amesbury he drove me to Bible study that his colleague [REDACTED] had invited him to. He touched me on my breasts openly while driving there and back in a manner that others driving by could see. He told me he liked that other people could see him doing this to me. When I was staying on Plum Island I went at Dr. Ablow’s invitation to a Ben Carson event at his house. He paid for my ticket.
15. The first year I treated with Dr. Ablow, he behaved in such a way that made me think he was going to leave his wife and we were going to be a couple. This was largely why I decided to move to Newburyport. He told me that he married the wrong woman and that he married his wife because she was pretty and would be a good mother and allow him to live his own life. Dr. Ablow explained that sex while married is never good forever unless you push the boundaries and that sex gets boring without domination. At one point he said that his wife gave him permission to move out and that we could live together at his property at 3 Center Street. When I asked Dr. Ablow if this meant we could get married, he said that it is too expensive to get divorced and suggested that he just separate from his wife. He would go on to tell me he has so much to lose by being in a relationship with me and that he has never done this before. At one point he told me we could get together when he stopped practicing medicine. He said he was just waiting on his other businesses (CauseMo, Neurogain, etc.) to take off so he would have enough money to be able to give up his medical license. I also asked Dr. Ablow more than once why we could not have sexual intercourse. He explained that we could not have intercourse now, but maybe down the road when I was no longer his patient or when he stopped practicing medicine.
16. As my relationship with Dr. Ablow progressed, he was more vocal about his preference for inflicting pain during our sexual interactions. He would tell me how he wanted to beat me and fantasized about tying me up to the ladder in the room next to his office. He would tell me how he wanted to stick objects in my vagina and anus until it hurt so much I cried. He also discussed his desire to humiliate me in public such as requiring me to ask permission to go to the bathroom at a restaurant and telling me no in front of the waitress. Although Dr. Ablow would not allow himself to climax, he would stop me right before he did and begin hitting me. He would hit my breasts, my vagina and my buttocks. Sometimes he would use his hands and other times he would take off the belt he was wearing and use that to strike me. This belt had a metal buckle with a skull on it. He was not gentle and sometimes left bruises. While I was on my knees he would tell me that I was his property and his slave and

that this was good for me. When I would tell Dr. Ablow that I did not like when he did those things to me, he would suggest that we weren't well matched since "this" is what sexually excites him. At the time, I was so emotionally dependent on Dr. Ablow and reliant on him for every aspect of my life that the thought of losing him was worse than the physical pain.

17. These sexual interactions occurred nearly every time I saw Dr. Ablow unless I was not feeling well or having my period. They occurred in his office, the library room next to his office with a couch and ladder, locations around the Newburyport area, and at the various locations I stayed in the area when he would visit me where I was living. Dr. Ablow often scheduled our time together by asking me to meet for coffee. I understood this to mean he wanted to get together for sexual reasons since I don't drink coffee and of course he knew that fact.
18. Dr. Ablow made sure we were very careful in our email and text message communications. When we were in person, Dr. Ablow would tell me how much he loved me and that we would be together in the future. However, when we were apart, Dr. Ablow insisted any intimate electronic communications about our relationship be done over an application called Wickr that was encrypted and self-erasing so our conversations would be erased after a very short period of time. His Wickr handle was Newworldorder3 and mine was [REDACTED]. Dr. Ablow helped me come up with the name. Over Wickr our conversations were often sexual, and on a few occasions he would express how what we were doing was wrong and that it needed to stop, although he never stopped. When Dr. Ablow requested that I send him nude photographs, he made sure it was done on this application as well. On one occasion I remember Dr. Ablow told me to shave my vagina before I sent him the pictures he requested.
19. Dr. Ablow also encouraged me to get a tattoo of his name or initials near my vagina or the top of my thigh. He told me he wanted anyone who saw it to know that my "pussy belonged to him" and that my "pussy was his property." I told him my immune system was too weak to get a tattoo. He also told me that I should get my nipples and clitoris pierced to increase sexual pleasure. I did not take his suggestion.
20. Dr. Ablow and I also became very involved in each other's personal lives outside of "therapy" sessions. When I wasn't feeling well, he would offer to get me groceries and have my laundry done. He said he would help me find new places to stay in Newburyport after my leases expired and sent his handyman, [REDACTED] over to help with installing an air conditioner that he gave me. Although Dr. Ablow and I were sexually involved, he would discuss at length about how I needed a boyfriend. He even talked about wanting to set me up with other men he knew, including [REDACTED] He [REDACTED] told me [REDACTED] was either getting a divorce or had just gotten one. It hurt me that he was trying to offer me to his friends and then he would switch back to saying I was his soul mate and he wanted to marry me. Nevertheless, he would be very possessive of me if I went on a date and inquire as to whether we were intimate and

he would want to know the details. I also learned many details about Dr. Ablow's personal life including about his negative relationship with his father and how he was unhappy in his marriage. He would tell me about his children and send me pictures of them at sporting events, Christmas, and other important life events.

21. Dr. Ablow was also very unusual in his prescription writing practices. He would offer to write me prescriptions for opioids, including Percocet (which I declined) and even offered some of his own personal Percocet, which I did not want to use. Dr. Ablow told me he wanted to try IM ketamine for himself. To that end Dr. Ablow wrote me a prescription for two vials of ketamine, one for me to use and one for him to use. I worried about giving it to him, but it seemed like a condition of me getting my prescriptions in the future. I brought him the vial and some of my needles and he gave me some money to cover the cost. On or about June 28, 2016, Dr. Ablow used some of the Ketamine he had written as a prescription for me and sent me an email about his experience. Following this he continued to write prescriptions for two vials of ketamine, some months he let me keep both vials (doubling my dose) and other he would ask for me to bring him the other one. The last time I recall giving him on was the summer of 2017 when he told me he wanted to try it with his sensory deprivation float pod like the neurophysiologist Dr. John C. Lily, who he told me had pioneered doing this and eventually became completely obsessed by it. I got accustomed to the higher dosage and more frequent use and he continued to write for the double dose even after he stopped asking for it. It felt like I was being paid for my complicity in his drug use. I did consider having a "real doctor" check my dosage to see if I was using too much but I did not know of any other doctors who would prescribe for self-administered IM ketamine on which I had become dependent. He led me to believe I was the only patient he did this for. In the fall/winter of 2015 he gave me his handheld vaporizer and marijuana that he claimed his former therapist/psychiatrist had given him a few years before. However, I did not like how marijuana made me feel. He also suggested that we use psychedelic mushrooms together and pushed for me to purchase LSD online to try micro dosing since he had another patient doing this. When I would ask him about new prescriptions to try he would just agree with whatever I asked him to write. When I asked him to refill my prescriptions, he would often just ask me my dosage versus reviewing my file. By the early spring of 2017, I felt like for my own sanity I needed to stop seeing Dr. Ablow, but I really felt I needed this medication and I needed him to get it for me. I felt trapped and powerless.
22. During the time I treated with Dr. Ablow, he gave me many gifts. At first it was things like books some of which he had written and a goLITE therapy light. He would offer to help me pay for things like Bikram Yoga and even got me a gym membership. He told me he would buy an infrared sauna for me to use whenever I wanted at his clinics. In May of 2014 when I was staying in Salisbury in the short term rental he had his handyman, [REDACTED] buy a window A/C unit and install it. He also promised to give me discounted sessions where he would only charge me for 15 minutes when he really saw me for a half hour, but never followed through. He gave me a very expensive Canadian Goose down jacket and also gave me several

pieces of jewelry. He gave me a bracelet from Kaya Jewelers around Christmas and brought it to my work. On multiple occasions Dr. Ablow gave me cash, which he would tuck into my prescriptions. Sometimes he would tell me to use the money on treatments I needed for my health. This often happened when I was frustrated in appointments since we would often spend the entire appointment talking about his life. In January 2018, he gave me a few hundred dollars. Sometimes I felt like he was giving me this money to keep me quiet. At times this made me feel like a whore.

23. After Dr. Ablow insisted that I contact him so frequently in the beginning of our relationship and he reciprocated in kind, he became largely unavailable by email or text message. At his request I would send him lengthy emails and then he would not respond or he would tell me he would respond at a later date. I would have to constantly follow up with him about scheduling appointments and prescriptions. As time went on Dr. Ablow would often reschedule or cancel our meetings because he forgot about other obligations he had with his family or work. He would make sure that I knew how busy he was and then I would feel guilty about being upset when he would cancel on me or not respond to my messages. When we would finally find time to be together, he would still expect us to be sexual.
24. In January 2016, I received a diagnosis of chronic Lyme disease which had gone undiagnosed for years and explained many of my symptoms. My treatment plan became very extensive. Dr. Ablow discouraged me from seeing other doctors and questioned their qualifications and ability to help me. He even questioned whether Lyme disease was real. Dr. Ablow did not like it when he wasn't in charge of my treatment. He would tell me how I was doing much better when I was seeing him more regularly for treatment and that we needed more intense time together for him to actually help me rather than seeing anyone else.
25. Around February 2018, I finally felt I had to stop seeing Dr. Ablow. I had grown very frustrated with his unavailability, not following through on his promises and not supporting my Lyme treatment, and it was clear he was never going to leave his wife and his promises about our life together were never going to happen. For much of the last year that I was Dr. Ablow's patient I was primarily seeing him reluctantly, only as often as was necessary to get my medications. When he asked to get coffee or meet outside of appointments, I made excuses. When he groped my breasts as an entrée to a further sexual encounter I would put him off and tell him I wan not feeling well. I felt like I had to keep him believing that I was still committed to protecting the secret about our involvement, or else he would be angry and I might be at risk of his wrath and suddenly without medication. I didn't think anyone else would write prescriptions for IM ketamine injections, because he'd told me that no one else would. I was convinced that I couldn't come off of the medication without going into a deep depression again. Shortly after admitting what was happening to my therapist, and telling her how conflicted and confused I was, I decided that I couldn't allow myself to be groped and used sexually and otherwise or to feel so emotionally dead

inside in exchange for prescriptions, even if I felt like I needed them, so I stopped seeing him.

26. I have only just started to appreciate all the harm that Dr. Ablow has caused me. After someone as confident as Dr. Ablow deemed that I was “special” and things ended, my self doubt and self-blame resurfaced at an all-time high. He told me many times that that he saw me through a different lens and that he knew me even better than I knew myself. I trusted Dr. Ablow and his opinions more than I trusted my own. Today, I continue to have trouble trusting myself, trusting other physicians and making my own treatment decisions because Dr. Ablow would place doubt in my mind when he wasn’t the one in charge of me. During the time I treated with him, I would cancel appointments with other doctors or stop seeing them altogether because I couldn’t handle Dr. Ablow being unhappy with me. I was paralyzed in making any decision without his approval because of my dependence on him. I wasn’t getting any better in the years I treated with Dr. Ablow because he would purposefully undermine any positive alliance I had with another provider. Dr. Ablow also created unrealistic expectations of how doctors should interact with me in a way that does not allow me to trust other doctors, which I never experienced before. I doubt whether my doctors are invested enough in my treatment since no one responds to my daily emails and text messages like Dr. Ablow did. Dr. Ablow had fostered a very distorted model with unhealthy expectations of a doctor patient relationship. Due to the issues outlined above, my active Lyme Disease, Epstein Barr Virus, Babesiosis, POTs, and Immune System Issues went largely untreated for 2 years. I finally started seeing Dr.

████████████████████ in January of 2018 for treatment of my Lyme disease. However, even though I now had the support of a friend who was diagnosed with Lyme and who recommended this doctor, I still had yelling, screaming panic attacks about not trusting this doctor to help me, that no one cared enough to spend the time needed to help me get better, and other fears. This happened several times before actually making it to the first appointment, and it was repeated for the following appointments as well. I’d been having these attacks any time I tried to go to a doctor since my relationship with Dr. Ablow began. I’d never had anything even remotely like this happen prior to seeing Dr. Ablow. These attacks were a big part of the reason I wasn’t able to see any doctor long enough to treat any of these illnesses. I couldn’t believe any of them cared, because Dr. Ablow had warped my ability to trust. Also, I wasn’t able to work with a therapist for those years, because Dr. Ablow strongly discouraged it, he said that he knew my relationship with him was a big part of my life, even though he wasn’t providing any real “therapy” by then, he told me not to see anyone else. When I said I needed more support, he said he’d “lean in” and help me more. I said I felt like I was drowning and felt like I wanted to die because life was too hard, but he didn’t help more, so I bore all of that alone, being ill, being in a new state without friends or family, and having confusion, guilt, and fear surrounding my relationship with Dr. Ablow. My relationship with Dr. Ablow resulted in self-loathing anxiety, anguish and heartache, and kept me fully dependent on Dr. Ablow. The years I was not getting therapy or treatment were full of physical and mental pain, sickness, nausea, migraines, exhaustion/fatigue, mental confusion, hopelessness, trouble trusting people, fear, and self-doubt. To have Dr. Ablow minimize my illness as he did and to sometimes even say that Lyme disease isn’t real, and that it was all in

my head, also did a lot of damage, especially coming from someone on whom I had become so completely dependent.

27. I also suffer from intimacy issues since my relationship with Dr. Ablow. I find it difficult for me to connect emotionally and sexually in relationships because I feel disconnected from my own body. I have a diminished sex drive and feel like I have to pretend to enjoy sexual interactions versus just saying no, which I did not struggle with until my relationship with Dr. Ablow, after he introduced me to a dominant/submissive behavior. I try to cut myself off emotionally when I have painful memories, which makes it hard to have meaningful relationships.
28. My decision to come forward with this information has not been easy and has made me fearful of how Dr. Ablow will react. I find myself having frequent intrusive nightmares, some of which include Dr. Ablow coming after me with a gun since he discussed his guns with me during sessions. These dreams are more vivid after talking about what happened to me. I triple check my locks and I don't like to have the windows open if I am alone. I also avoid Newburyport when I can because I am terrified of running into Dr. Ablow.
29. Since stopping my treatment with Dr. Ablow, he continued to reach out to me and my mother. Dr. Ablow contacted me to "check in" around the time I read a newspaper article and learned that I was not the only woman he had abused. I believe he was concerned that I too would speak out about our relationship. I hope by making this complaint, I can help stop Dr. Ablow from taking advantage of other vulnerable women in the future.

Dated: 12/03/18

